

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

COUNSEL HOLDINGS, INC.

Plaintiff

v.

EVAN P. JOWERS, LEGIS VENTURES
(HK) COMPANY LIMITED, JOWERS
VARGAS LLC, and JOWERS LANGER
LLC,

Defendants.

Civil Action No. 1:23-CV-711

DECLARATION OF EVAN P. JOWERS

I Evan P. Jowers declare

1. I am Evan P. Jowers and am over the age of 18 and am otherwise competent to testify
2. I have not taken any relevant action in the State of Texas. I was employed in Miami, Florida by Kinney Recruiting, LLC until June 2015, when he relocated me to Hong Kong to become an attorney recruiter for Kinney Limited, Kinney's Hong Kong operation.
3. In December 2016, I terminated my relationship with Kinney Recruiting Hong Kong and subsequently became an attorney recruiter with Legis Ventures. I recruit candidates almost exclusively in Asia. Since well before leaving my employment with Kinney Recruiting, I have not contacted any attorney candidate in Texas, whether on behalf of Kinney Recruiting, LLC, Kinney Recruiting Hong Kong, Legis Ventures, or otherwise, for placement anywhere, nor have I placed a candidate at any law office in Texas. Since I resigned from Kinney's recruiting companies, I have only been to Texas five times. One of those times was for the trial in the First Lawsuit in December 2021 in Austin. Another occasion was for an in-person settlement mediation attempt in 2022 in Austin. Another occasion was for the deposition of

Robert Kinney in the First Lawsuit. I also traveled to Austin for an LSU at Texas college football game in 2019 and a Louisiana at Texas college football game in 2021.

4. I have at all material times been a resident of the State of Florida. I also have been a resident of Hong Kong for part of the time since December 2016, when I resigned from Kinney's recruiting operation.
5. The Employment Agreements that I have signed have all applied Florida law, and at all material times, I have not been physically present in the State of Texas.
6. It would offend traditional notions of fair play and substantial justice for me to be forced to litigate in the United States District Court for the Western District of Texas.
7. Similarly, Legis Ventures is a recruiting firm that primarily places candidates at large law U.S. and U.K. based law firms in their offices in Asia. It does not have, nor has it ever had, any office, facility, place of business, or operations in Texas. Further, Legis has never placed a candidate at any law office located in Texas, or even at any law firm that is headquartered in Texas. Nor has Legis Ventures ever recruited any attorney located in Texas for placement at any law office in Asia—it has had no phone conversations, no meetings, and no email exchanges with any attorney candidate in Texas.
8. Jowers Vargas LLC is a recruiting firm registered in Florida. It has never made a placement in Texas. Jowers Langer LLC is not in operation any longer, since the key partner Adam Langer left the Jowers Vargas / Legis family of recruiting companies.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 26, 2023

By: /s/Evan Jowers
Pro Se

Email: evan@jowersvargas.com
Phone: 917-292-8675

CERTIFICATE OF SERVICE

I hereby certify that, on December 26, 2023, a true and accurate copy of the foregoing document was served via the Court's drop box, return receipt requested to all counsel of record.

Evan Jowers

Evan Jowers